

**CC Docket No. 94-102 – E911 Interim Report**

Filed By: Sagir, Inc.  
David P. Tews  
18 Beechnut Terrace  
Ithaca, NY 14850

Date: August 1, 2003

To: Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

By Electronic Submission:

John Muleta  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

David Solomon  
Chief, Enforcement Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules To	)	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911	)	
Emergency Calling Systems	)	
	)	
Phase II Compliance Deadlines for Non-	)	
Nationwide CMRS Carriers	)	
	)	
	)	
To: The Commission	)	

**INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT**

**SAGIR, INC.**

Sagir, Inc. (Sagir), hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*. Sagir operates in the Nebraska 1 (Sioux) Rural Service Area in the A band of the Cellular Mobile Radio Service. Sagir has fewer than 500,000 subscribers, and is thus a Tier III wireless carrier. This report follows the format suggested by the "Further Guidance" Public Notice released on June 30, 2003.

**1. The Number of Phase I and Phase II Requests from PSAPs**

Sagir has received two E911 Phase I and no E911 Phase II requests. Both E911 Phase I requests are beyond the 6-month implementation time frame, and are still in the process of being implemented.

Sagir received a Phase I request from the PSAP in Scottsbluff County, NE on 7/16/02. Sagir met with the PSAP and ILEC (Sprint United Telephone) in August, 2002 and agreed upon a technology to implement Phase I E911 upon PSAP readiness. The intervening period has been spent with the ILEC implementing its nationwide Automatic Location Information (ALI) database, and the PSAP creating/updating its Master Street Address Guide. The Sprint National ALI database is now implemented, but the Scottsbluff County PSAP is still updating his MSAG records for Banner and Sioux Counties. Until the MSAG is finished, the Scottsbluff PSAP will not be able to put the records into the ALI, and we will not be able to order trunking or implement Phase I service. The ILEC anticipates that we should be able to move forward with our implementation in approximately 60 days.

Sagir received a Phase I request from the PSAP in Cheyenne County, NE on 9/12/02. Sagir contacted the Cheyenne County PSAP in December, and discussed our intention to use a CAS (Channel Associated Signaling) solution to implement Phase I E911 in Cheyenne County. We attempted to contact the ILEC (Qwest, Inc.), but were unable to make contact with an appropriate party until January, 2003. At this time, we found out that Qwest was unable to support a CAS solution, but had a HCAS (Hybrid Channel Associated Signaling) solution available. We were told that this solution (Cell Trace) required that ALI records be entered through a software interface called "SCC Connect" which was available from Qwest's ALI contractor, Intrado Inc. Sagir contacted Intrado many times over the intervening months, attempting to obtain this software. Sagir also attempted to obtain it from Qwest itself, if they had it available. Sagir even offered to contract with Intrado to do the ALI record entry for Sagir, if that was of interest. At all stages, all the Intrado employees contacted either did not know of this product, or claimed that they could not make it available to us.

In the past week, Sagir, in consultation with the Nebraska E911 Director and representatives of Qwest, has decided to pursue an NCAS solution, to get this implementation moving forward again. Sagir has a quote from Intrado, and is in the process of establishing a contract with them. Sagir is fully prepared to order trunking immediately, and has all other information necessary to implement E911 in Cheyenne County. At this time we anticipate having a solution in place in the very near future.

## **2. The Carrier's Specific Technology Choice**

Sagir operates a TDMA network. As far as Sagir is aware, there are no ALI capable TDMA handsets available or planned for production. For this reason, Sagir plans to deploy a network-based solution for E911 phase II. Sagir is deeply concerned, however, that the accuracy requirements of the Commission's regulations will be very difficult for rural carriers to meet without destroying their economic viability.

## **3. Status of Ordering and/or Installing Necessary Network Equipment**

Sagir successfully upgraded our Nortel switch to the required software load for E911 Phase I (MTX09) in January of 2002. As of that date, Sagir's switch is fully capable of E911 Phase I. All equipment that is required to comply with an E911 Phase I request is in place.

Sagir successfully upgraded our Nortel switch to the required software load for E911 Phase II (MTX10) in June of 2002. As of that date, Sagir's switch is fully capable of E911 phase II. We have not ordered any other equipment for Phase II implementation, since we have not yet received a Phase II request.

## **4. ALI-Capable Handset Availability**

ALI capable TDMA handsets are not available from any manufacturer.

**5. The Estimated Date on which Phase II Service will be Available in The Carrier's Network**

Sagir anticipates being able to deploy Phase II capability within six months of receipt of a Phase II PSAP request. Sagir does, however, anticipate difficulties in meeting the FCC's location accuracy requirements, given the rural nature of our coverage area.

**6. Information on Whether the Carrier is On Schedule to Meet the Ultimate Implementation Date of December 31, 2005.**

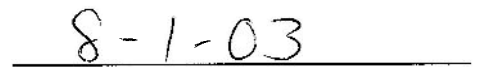
Sagir's E911 Phase II implementation date will depend upon the requirements of the PSAPs that we serve, and their ability to handle Phase II information. At this time, we anticipate no difficulties in our responding to a PSAP request in a timely manner.

### **Declaration of David P. Tews**

I, David P. Tews, Vice President of Sagir, Inc., do hereby declare under penalty of perjury that I have read the foregoing E-911 Interim Report and that the facts stated therein are true and correct, to the best of my knowledge, information and belief, and are made in good faith.

A handwritten signature in black ink, appearing to read "D. P. Tews", written over a horizontal line.

David P. Tews

A handwritten date "8-1-03" in black ink, written over a horizontal line.

Date